

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

ENVIGO RMS, LLC,

*Defendant.*

Case No. 6:22-00028-NKM

**JOINT MOTION FOR EXTENSION OF TIME**

The parties respectfully move for an extension of time to confer and inform the Court of the parties' plan for transferring all remaining beagles out of the Cumberland Facility. ECF No. 22; ECF No. 24. The parties are unable to meaningfully confer and present a joint transfer plan to the Court with the current uncertainty regarding the number of beagles that will be covered by the transfer plan. The Court is now in receipt of the United States' motion for clarification of the Court's June 17, 2022 preliminary injunction order, ECF No. 26, and Envigo's "motion for consent of the Court to proceed with fulfilling existing customer orders," ECF No. 25. A ruling on these motions by the Court will significantly affect the number of beagles that will be the subject of the joint transfer plan. Because the joint transfer plan will necessarily involve one or more non-governmental organizations transferring the remaining dogs from the Cumberland Facility, and the number of beagles that will remain at the Cumberland Facility is uncertain, the parties respectfully request that the Court extend the parties' deadline to submit a joint transfer plan until 48 hours after the Court's resolution of the two motions currently pending before the Court.

DATED: June 24, 2022

Respectfully Submitted,

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